

PATENT**D3239-00002****III. Remarks**

Claims 1-6, 8-14, 16-22, 24 and 26-34 are presently pending in the present application.

Applicants are grateful to the Examiner for withdrawing the previous rejection of the claims as set forth in the Final Action of September 16, 2005.

A. Claim Rejection under 35 U.S.C. §103(a)**1. Claims 1-2, 5-6, 8-10, 13-14, 16-18, 20-22, 24 and 28-33**

The Action rejects Claims 1-2, 5-6, 8-10, 13-14, 16-18, 20-22, 24 and 28-33 as being obvious in view of U.S. Patent No. 5,581,682 to Anderson et al. (hereinafter "Anderson") in view of the Pontin article regarding the SnagIt product (hereinafter "SnagIt"). Reconsideration and withdrawal of the rejection of these claims are respectfully requested in view of the foregoing amendments and following arguments.

(a) Independent Claims 1, 9 and 17

Using Claim 1 as an example, the Examiner concedes that Anderson does not teach at least the step of "creating an electronic output file, said identified content not present in said output file, a redacted document being producible from said output file for display." Applicants have discussed Anderson in depth in prior responses, and a detailed discussion of Anderson is not warranted. Suffice it to say though, that the Examiner correctly makes this concession because Anderson clearly teaches an abstraction overlay methodology that does not remove the original content from the electronic version of the abstracted document. In the new rejection, the Examiner relies on SnagIt for providing this feature.

As described in the present application, for example at Page 6, first full paragraph, electronic documents such as PDF files include an underlying set of instructions, for example a PDF instruction stream, that includes information on the content (e.g., textual-type content, text font, text size, image-type content, etc.) and content location. As part of the redaction process,

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Claim 1 recites the step of identifying information (i.e., the underlying instruction data) in the document that represents content and location and nature of content. Claims 1, 9 and 17 have been amended to recite as follows: creating an electronic output file, said output file comprising said identified information except for portions of said information corresponding to said identified content, a redacted document being producible from said output file for display." In other words, Claim 1 recites that the underlying instruction set (i.e., the "identified information") of the electronic document is maintained by the redaction process and contained in the electronic output file except for the portions of the instruction set that correspond to the identified content, i.e., the content that is being redacted. In this manner, complete continuity between the original file and the redacted file is maintained, except for instructions that correspond to the content being redacted. As described below, the combination suggested by the Examiner would not operate in this manner.

In the Examiner's suggested combination of Anderson and SnagIt, the user would first create a redacted document on-screen using the software of Anderson and then use SnagIt to capture the redacted document "via screen shot capture," creating an image file of the screen shot. It would be apparent to those in the art that this methodology would not capture, for lack of a better term, the underlying "information in the [electronic] document representing content and location and nature of content." Put another way, no portion of the underlying instruction set for the original electronic document would survive into the newly created image file. The image file would have its own unique instruction set in its own format, e.g., .gif, .jpeg, etc. that has no direct correlation to or overlap with the original underlying electronic information in the *electronic document* being redacted. By way of analogy, the suggested combination is no different than taking a digital photograph of the Anderson redacted document and then uploading that digital photo onto the computer as a .gif or jpeg file for storage. Clearly, such a methodology does not preserve any part of the underlying instructions of the original electronic document.

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In contrast to the suggested combination, the redaction method of Applicant's amended Claims 1, 9 and 17 preserve the original instruction set except for the portion of the instruction set that corresponds to the redacted content, i.e., the claims now recite that the created electronic output file includes "said identified information except for portions of said information corresponding to said identified content."

For at least these reasons, it is submitted that combination suggested by the Examiner does not teach each feature of Claims 1, 9 and 17. Claims 1, 9 and 17, therefore, are not obvious from and are allowable over the cited combination. For analogous reasons, Claims 2-4, 10-12, 18-20, 28-33, which depend from these claims, are also allowable.

(b) Independent Claims 5, 13 and 21

Using independent Claim 5 as an example, Independent Claim 5 is directed to a method for designating portions of a document comprising content including at least one image for redaction. Among other steps, Claim 5 recites "designating a geographic region of the document for redaction" and "saving the designations with the document." In the rejection, the Examiner finds that Anderson does not disclose saving designations with the document. The Examiner then relies on SnagIt for supplying this feature. More specifically, the Examiner concludes that saving the captured screen shot meets the limitation of "saving the designations with the document." It is submitted that the Examiner has misconstrued this feature. The Examiner's analysis essentially considers the limitation to be the same as a step of saving the redacted document. This is not the case. Rather, Claim 5 requires that it is the "designations [of the geographic region of the document for redaction]" that are saved "with the document", i.e., with the original document. For at least these reasons, SnagIt does not provide this missing feature.

Still further, Claim 5 recites that the designating step includes the step of manipulating a frame displayed on the document where content having a geographical location within the frame is visible to the user during the manipulation step. The manipulable frame is shown, for example, as window 45 in FIG. 2 of Applicants' disclosure.

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The Examiner concludes that Anderson teaches this feature in Column 6, Lines 12-20 and in Figures 3A-3B and 4. It appears from a reading of the rejection that the Examiner is focusing on the displayed annotated document of Anderson, as opposed to the actual method Anderson uses to designate areas for annotation/redaction. Indeed, Figures 3A-3B and 4 of Anderson show the display of the annotated documents having annotation blocks overlaid onto the document.

The portion of Anderson's disclosure upon which the focus must lie is on **how the system of Anderson enables the user to add the overlays**, not the display of the already annotated document. Anderson's discloses only that the user can specify the characteristics and content of the annotation, including location, size and orientation, by a "command entry or a pull down menu." (Column 6, Lines 16-20). This dearth of disclosure does not teach or suggest "wherein said step of designating [a geographic region of the document for redaction] comprises manipulating a frame displayed on the document, content having a geographical location within said frame being visible to the user during said step of manipulation, said content comprising at least one image" as claimed in Claim 5.

In summary, the "command entry and pull down menu" is not a frame displayed to a user, with content visible in the frame, to assist in designating content to be redacted. It is submitted, therefore, that Claim 5 and Claims 6 and 8, which depend from Claim 5, are allowable over the cited combination.

Like Claim 5, Independent Claims 13 and 21 both recite the manipulation feature for designating a geographic region of a document for redaction. For at least the reasons set forth above in connection with Claim 5, it is submitted that Claims 13 and 21, and Claims 14 and 16 and 22 and 24, which depend from Claims 13 and 21, respectively, are also allowable. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

PATENT**D3239-00002****(c) Claims 31-33**

Claims 31-33 depend from independent Claims 1, 9 and 17 and are, therefore, allowable for at least the reasons set forth above.

Still further, Claims 31-33 each recite that the removal step comprises “replacing pixels corresponding to the identified content.” Applicants submit that the Examiner concedes that Anderson does not teach this feature. Indeed, Anderson accomplishes visual modification using overlays, not replacement of pixels. The Examiner then argues that because SnagIt “teaches permanent flattening of a file, it would have been obvious to one of ordinary skill in the art . . . to implement redaction via pixel by pixel replacement.” As discussed above, SnagIt produces an image file that is a “screen capture.” As a screen capture, it is not replacing anything; rather, SnagIt essentially takes a photo of whatever is displayed on the screen. Combining this screen capture feature with the redaction method of Anderson does not provide the step of “replacing pixels corresponding to the identified content.” Indeed, nothing is replaced. Rather, an entire new image file is created.

For at least these additional reasons, it is submitted that Claims 31-33 are independently allowable over the cited combination.

2. Claims 3-4, 11-12, 19, 26-27 and 34

The Action rejects Claims 3-4, 11-12, 19, 26-27 and 34 as being obvious from the Anderson/SnagIt combination in further view of Redax. Claims 3-4, 11-12 and 19 depend from Claims 1, 9 and 17, which are allowable as set forth above.

Amended independent Claims 26 recites that the electronic document comprises a PDF data stream and that the created output PDF file comprises “said PDF data stream except for portions of said PDF data stream corresponding to said identified content.” As explained above, the combination of Anderson and SnagIt does not preserve the non-redacted portions of the underlying instruction set, here the PDF data stream. Therefore, for reasons analogous to those

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argued above in connection with Claims 1, 9 and 17, it is submitted that independent Claim 26 is allowable over the cited combination. Claims 27 and 34 depend from Claim 26 and are, therefore, also allowable.

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IV. Conclusion

In view of the foregoing remarks, Applicants submit that this application is in condition for allowance at an early date, which action is earnestly solicited.

The Commissioner for Patents is hereby authorized to charge any additional fees or credit any excess payment that may be associated with this communication to deposit account 04-1679.

Respectfully submitted,

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Joseph A. Powers
Joseph A. Powers, Reg. No.: 47,006
Attorney For Applicants

DUANE MORRIS LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103-4196
(215) 979-1842 (Telephone)
(215) 979-1020 (Fax)